

AB:JBD

23-MJ-47

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

- against -

EDDIE HOOVER, RAMELL HOOVER,
MIKE JOSIE AND HAMIDOU SARR,

Defendants.

COMPLAINT

(18 U.S.C. §§ 924(c)(1)(A)(ii),
1951(a) and 2)

Case No.

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EASTERN DISTRICT OF NEW YORK, SS:

FINNBAR FLEMING, being duly sworn, deposes and states that he is a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”), duly appointed according to law and acting as such.

On or about January 13, 2023, within the Eastern District of New York and elsewhere, the defendants EDDIE HOOVER, RAMELL HOOVER, MIKE JOSIE AND HAMIDOU SARR did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of goods and United States currency from a convenience store located on Guy R. Brewer Boulevard in Queens, New York (the “Convenience Store”).

(Title 18, United States Code, Sections 1951(a) and 2)

On or about January 13, 2023, within the Eastern District of New York and elsewhere, the defendants EDDIE HOOVER, RAMELL HOOVER, MIKE JOSIE AND HAMIDOU SARR did knowingly and intentionally use and carry one or more firearms during

and in relation to a crime of violence, to wit: the Convenience Store robbery charged in Count One above in violation of 18 U.S.C. §§ 1951(a) and 2, and did knowingly and intentionally possess such firearms in furtherance of such crime of violence, which firearms were brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Task Force Officer with the ATF and have been since 2014. My experience has included investigating and tracking individuals involved in a variety of violent crimes, including commercial robberies. In the course of my work, I have conducted physical surveillance, executed search warrants, and reviewed electronic records, including records regarding cell phone location information. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, photos and videos; and from reports of other law enforcement officers involved in the investigation. Where I describe the statements of others, I am doing so only in sum and substance and in part.

2. On or about January 13, 2023, at approximately 9:35 p.m., three robbers entered and robbed the Convenience Store. One of the robbers, subsequently identified as MIKE JOSIE, brandished a firearm. JOSIE proceeded to pistol whip a Convenience Store employee, a minor ("Victim-1"), and rifled through the pockets of two other employees present at the store ("Victim-2" and "Victim-3"). In addition and among other things, JOSIE took cash

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

from the Convenience Store's cash register; marijuana and marijuana paraphernalia that was at the store; a blue bag belonging to one of the victim's; and another black plastic bag.

HAMIDOU SARR, among other things, took money and goods stolen by JOSIE and placed them in a black plastic bag, while EDDIE HOOVER, among other things, acted as a look-out, preventing any customers from entering or leaving the store while the robbery took place.

3. The robbery was captured by security camera footage in the Convenience Store. Each of the robbers is seen on security camera footage wearing a face covering and gloves. Two of the robbers—HAMIDOU SARR and EDDIE HOOVER—are seen wearing dark plastic bags on their feet to cover their shoes, while the third—MIKE JOSIE—can be seen wearing white Air Force One shoes, black sweatpants and a blue sweatshirt. SARR wore black pants and EDDIE HOOVER wore light-colored pants.

4. A still photograph showing EDDIE HOOVER, MIKE JOSIE and HAMIDOU SARR entering the Convenience store ("Image 1"), as well as a still photograph of JOSIE assaulting Victim-1 ("Image 2") are depicted below.

Image 1



Image2



5. When MIKE JOSIE, HAMIDOU SARR and EDDIE HOOVER left the Convenience Store following the robbery, Victim-2 proceeded to chase them by car. As Victim-2 chased JOSIE, SARR and EDDIE HOOVER, Victim-2 encountered officers from the New York City Police Department (“NYPD”). Victim-2 pointed to JOSIE, SARR and EDDIE HOOVER, who were at that point walking westbound on Liberty Avenue, and in sum and substance, stated that they had just robbed the Convenience Store and had a gun.

6. NYPD officers then gave chase to MIKE JOSIE, HAMIDOU SARR and EDDIE HOOVER. Police were able to immediately apprehend EDDIE HOOVER. After a brief chase, police apprehended HAMIDOU SARR shortly after seeing him enter the passenger side door of a 2007 white Chevy Malibu in the vicinity of Liberty Avenue and 160th Street. RAMELL HOOVER was in the car’s driver seat and was apprehended, as well.

7. HAMIDOU SARR and EDDIE HOOVER were arrested with dark plastic bags covering their shoes. SARR was also arrested wearing the black pants seen in the Convenience Store video and EDDIE HOOVER was arrested in the light-colored pants he was seen wearing in the Convenience Store video. A total of \$457 in cash was recovered from SARR, EDDIE HOOVER and RAMELL HOOVER and a bag containing both a substance believed to be marijuana and marijuana paraphernalia was also recovered from the 2007 white Chevy Malibu being driven by RAMELL HOOVER. A blue bag belonging to one of the victims was also recovered on Liberty Avenue, in the vicinity of where SARR, EDDIE HOOVER and MIKE JOSIE were first encountered by police.

8. As police gave chase to EDDIE HOOVER and HAMIDOU SARR heading westbound on Liberty Avenue, MIKE JOSIE reversed course and fled eastbound on Liberty Avenue, before heading southbound on Guy R. Brewer Boulevard. As he fled, JOSIE

was seen on security camera footage dropping a black bag that he was seen taking from the Convenience Store. Police recovered a firearm matching the firearm seen on the Convenience Store's security camera footage from the black bag, along with marijuana paraphernalia.

9. Approximately 20 minutes later, the NYPD received a 9-11 call reporting a suspicious person seen in the backyard of a residence in the vicinity of 164th Street and 107th Avenue. When police arrived at the scene, they found MIKE JOSIE attempting to hide under a car parked on the street. JOSIE was wearing white Air Force One sneakers and black sweatpants, matching the description of the Convenience Store robber who brandished a firearm and pistol-whipped Victim-1. A blue sweatshirt matching the sweatshirt he was seen wearing on the Convenience Store's security camera footage was found nearby.

WHEREFORE, your deponent respectfully requests that the defendants EDDIE HOOVER, RAMELL HOOVER, MIKE JOSIE AND HAMIDOU SARR be dealt with according to law.

/s/ Finnbar Fleming

FINNBAR FLEMING
Task Force Officer
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Sworn to before me on January ___, 2023

HONORABLE ROBERT M. LEVY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK